

1 **ALAN KORN - 167933**
2 LAW OFFICE OF ALAN KORN
3 1840 Woolsey Street
Berkeley, California 94703
4 Phone: (510) 548-7300
Fax: (510) 540-4821

5 Attorneys for Plaintiffs

6 **Robert K. Phillips - 135088**
7 **Sharon E. How - 216812**
PHILLIPS, SPALLAS & ANGSTADT LLP
8 650 California Street, 10th Floor
San Francisco, California 94108
Phone: (415) 278-9400
Fax: (415) 278-9411

9 Attorneys for Defendants

10

11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**

13

14 JENNIFER TORO, an individual and) Case No. **C 05-3334 MJJ**
15 WILLIAM ALERS, an individual)
16 Plaintiffs,)
17 v.)
18 JPMORGAN CHASE BANK, N.A.)
(erroneously sued as J.P. MORGAN)
19 CHASE BANK, INC.), a Delaware)
Corporation, GETTY IMAGES, INC., a)
20 Washington Corporation, DIGITAL)
VISION ONLINE.COM, LLC, a Delaware)
21 Limited Liability Company, NANCY NEY,)
an individual, and NANCY NEY)
22 STUDIOS, INC., a New York Corporation,)
23 Defendants.)
24

**STIPULATION TO CONTINUE
PLAINTIFF JENNIFER TORO'S
MOTION TO COMPEL PRODUCTION
OF DOCUMENTS AND FURTHER
INTERROGATORY RESPONSES AND
[PROPOSED] ORDER**

Current Hearing Date: June 23, 2006
Proposed Hearing Date: August 11, 2006

25 Defendants JPMORGAN CHASE BANK, N.A. (erroneously sued as J.P. Morgan
26 Chase Bank, Inc.), DIGITAL VISION ONLINE.COM, LLC, NANCY NEY, and NANCY
27
-- Stipulation to Continue Hearing Date and [Proposed] Order
Case No. C 05-3334 MJJ

1 NEY STUDIOS, INC. (hereafter referred to as "Defendants") and Plaintiffs JENNIFER
2 TORO and WILLIAM ALERS (hereinafter referred to as "Plaintiffs") by and through
3 their undersigned counsel, hereby stipulate as follows:

4 The hearing date on Plaintiff Jennifer Toro's Motion to Compel Production of
5 Documents and Further Interrogatory Responses is currently set for June 23, 2006.
6 The parties are however engaged in extensive settlement discussions and wish to
7 continue the June 23, 2006 hearing date. Based on the ongoing good faith efforts of
8 Plaintiffs and Defendants in these settlement discussions, and in order to further
9 encourage good faith settlement discussions, Plaintiffs and Defendants hereby stipulate
10 to continue the hearing date on Plaintiff Jennifer Toro's Motion to Compel Production of
11 Documents and Further Interrogatory Responses in the above matter to August 11,
12 2006.

13 So Stipulated:

14

15 Date: June 14, 2006

LAW OFFICE OF ALAN KORN

16

17

By: /s/ Alan Korn
Alan Korn, Esq.
Attorneys for Plaintiffs

18

19 Date: June 14, 2006

PHILLIPS SPALLAS & ANGSTADT, LLP

20

21

By:/s/ Sharon How
Sharon E. How, Esq.
Attorneys for Defendants

22

23

24

ORDER

25 This court having reviewed the parties' stipulation to continue the hearing date on
26 Plaintiff Jennifer Toro's Motion to Compel Production of Documents and Further
27 Interrogatory Responses in the above matter to August 11, 2006, and finding good
-- Stipulation to Continue Hearing Date and [Proposed] Order
Case No. C 05-3334 MJJ

1 cause;

2 IT IS HEREBY ORDERED that the hearing date on Plaintiff Jennifer Toro's
3 Motion to Compel Production of Documents and Further Interrogatory Responses in the
4 above matter is continued to August 11, 2006, at 1:30 PM.

5 IT IS SO ORDERED.

6

7 Dated: June 16, 2006

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

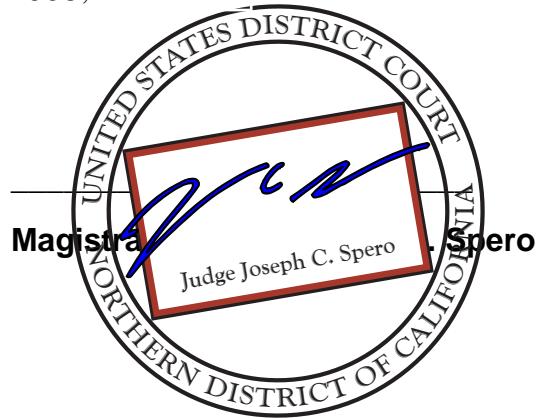
24

25

26

27

-- Stipulation to Continue Hearing Date and [Proposed] Order
Case No. C 05-334 MJJ



PROOF OF SERVICE

Jennifer Toro et al. v. J. P. Morgan Chase Bank, Inc. et al.

United States District Court Northern District of California Case No. C 05-3334 MJJ

I, the undersigned, declare:

That I am employed in the City and County of San Francisco, State of California; am over the age of eighteen years and not a party to the within cause; that my address is 650 California Street, Tenth Floor, San Francisco, California 94108.

That on **June 14, 2006**, I served the within:

**STIPULATION TO CONTINUE PLAINTIFF JENNIFER TORO'S MOTION TO
COMPEL PRODUCTION OF DOCUMENTS AND FURTHER INTERROGATORY
RESPONSES AND [PROPOSED] ORDER**

11 on the parties listed in said cause by causing them to be sent via email, to the
12 addressee at the following address; and by placing a true copy thereof enclosed in a
13 sealed envelope with postage thereon fully prepaid, in the outgoing mail box located in
14 my office addressed as set forth below in accordance with ordinary business practices
15 for deposit with the United States Postal Service in San Francisco, California. I am
16 readily familiar with my office business practice for collection and processing of
17 correspondence for mailing and the within correspondence will be deposited with the
18 United States Postal Service;

19 Alan Korn, Esq.
LAW OFFICE OF ALAN KORN
20 1840 Woolsey Street
Berkeley, California 94703
21 Phone: (510) 548-7300
aakorn@iqc.org

22 I declare under penalty of perjury under the laws of the State of California that
23 the foregoing is true and correct. Executed on **June 14, 2006**, at San Francisco,
24 California.

/s/ Ada Yu

Ada Yu

-- Stipulation to Continue Hearing Date and [Proposed] Order
Case No. C 05-3334 MJJ